REMARKS / ARGUMENTS

Status of Claims

Claims 1-9 and 11-14 were pending and have been rejected by the Examiner.

Applicants have amended Claims 1, 2, 5, 6, 9, 13, and 14. Claim 12 has been cancelled.

Accordingly, claims 1-9, 11, and 13-14 are presented and at issue.

Rejections Under 35 U.S.C. §103(a)

Claims 1-9 and 11-14 are rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Adar (U.S. Patent No. 6,493,702, hereinafter "Adar") in view of Tran (U.S. Patent No. 200/0099784, hereinafter "Tran"). The Applicants respectfully traverse the outstanding rejections and submit that claims 1-9, 11, and 13-14 are in condition for allowance.

Independent claims 1 and 5 have been amended to recite, *inter alia*, "launching the web key tool at a second user client system in response to the second user client system receiving the request from the first user client system", the web key tool "processing the information and the link, the processing determining whether or not the information and the link are approved for storage in the central storage location". Independent claim 9 has been amended to include similar recitations for a system.

Support for these amendments may be found throughout Applicants' specification and, in particular, on page 5, lines 11-14 where client system 116 (FIG. 1) is described as a workstation operated by a system administrator which controls database content and access to data storage device 118. Accordingly, client system 116 may be considered as one illustrative implementation for the second user client system of claims 1, 5, and 9, with first user client system being implemented, for purposes of illustration, by client system 114. Moreover, at page 7, line 8 to page 8, line 16, procedures are described wherein an employee (for example, using client system 114) "transfers the link information to a system administrator or web key administrator via client system 116 at

step 204" (FIG. 2). "This can be done via email or any convenient means of communication". Accordingly, no new matter has been added.

Applicant respectfully submits that the obviousness rejection based on Adar and Tran is improper as, even if Adar and Tran are somehow combined, the resulting combination fails to teach or suggest each and every element of the instant invention. For an obviousness rejection to be proper, the Examiner must meet the burden of establishing a prima facie case of obviousness. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988). The Examiner must meet the burden of establishing that all elements of the invention are taught or suggested in the prior art. MPEP §2143.03.

Adar discloses a centralized bookmark database connected to the Internet. With reference to Col. 6, lines 1-3 of Adar, a user's primary interaction with the bookmark database 120 takes place through a main bookmark window 210 (FIG. 2) provided by the user's browser 122 (FIG. 1). Referring to Col. 8, lines 46-49, the user manually selects a category in which to add the bookmark, enters a URL for the bookmark, and enters a title for the bookmark. The browser passively collects user input and passes it along to database 120 for processing (Col. 10, lines 10-13). Adar states that "the specific operations on the database side of the system...represent simple data manipulation operations, which will not be described further" (Col. 11, lines 41-46).

Adar fails to disclose or suggest Applicants' claimed launching of a web key tool at a second user client system in response to the second user client system receiving a request from the first user client system. Instead of responding to receipt of a user request to add a bookmark at a first user client system by initiating launching of a web key tool at another user client system, Adar's mechanism for adding bookmarks to a database relies upon a single user client system (Col. 10, lines 10-13). Adar utilizes a direct interface between the user and the database, with no mechanism provided by which administrative personnel are able to prevent entry of inappropriate or erroneous bookmarks into its bookmark database. Rather, user inputs specifying bookmark additions are added to the database using "simple data manipulation operations". By contrast, Applicants' claimed techniques incorporate a processing step wherein the web key tool processes "the

information and the link, the processing determining whether or not the information and the link are approved for storage in the central storage location".

Tran discloses a technique for storing "bookmark information either locally or on a remote server, depending upon what the user desires. If the user wants to store the bookmark information locally, then the bookmark information may be stored on the host computer system that is executing a current application the user is using. If the user does not want to store the bookmark locally, then the bookmark information may be stored on a server computer system." (see paragraph [0012] of Tran).

Tran fails to disclose or suggest Applicants' claimed launching of a web key tool at a second user client system in response to the second user client system receiving a request from the first user client system. Rather, Tran describes a user system accepting a request to store bookmark information (see paragraph [0012]), but no initiation of a web key tool program at another user client system is described or suggested. As recited in Applicants' claims 1, 5, and 9, this web key tool processes "the information and the link, the processing determining whether or not the information and the link are approved for storage in the central storage location". Moreover, Tran fails to disclose any mechanism by which administrative personnel are able to prevent entry of inappropriate or erroneous bookmarks into its bookmark database. Rather, Tran's mechanism for adding bookmarks to a database merely utilizes a direct interface between the user and the remote server.

In view of the foregoing considerations, it is submitted that claims 1, 5, and 9 are patentable over Adar in view of Tran. Dependent claims inherit all of the limitations of the respective parent claim and any intervening claim. Claims 2-4 depend from claim 1 and inherit all limitations thereof. Similarly, claims 6-8 depend from claim 5 and inherit all limitations thereof. Finally, claims 11, 13, and 14 depend from claim 9 and inherit all limitations thereof. Accordingly, it is submitted that claims 2-4, 6-8, 11, and 13-14 are patentable over Adar in view of Tran for the reasons set forth previously in connection with claims 1, 5, and 9.

In view of the foregoing, Applicants submit that Adar and Tran fail to teach or suggest each and every element of the claimed invention and are therefore wholly inadequate in their teaching of the claimed invention as a whole, fail to motivate one skilled in the art to do what Applicants have done, fail to recognize a problem recognized and solved only by the present invention, and discloses a substantially different invention from the claimed invention, and therefore cannot properly be used to establish a prima facie case of obviousness. In addition to the foregoing, Applicants find no motivation in either Adar or Tran to modify Adar in view of Tran to arrive at the claimed arrangement of elements.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of all rejections under 35 U.S.C. §103(a), which Applicant considers to be traversed.

CONCLUSION

In light of the foregoing, Applicant respectfully submits that the Examiner's rejections under 35 U.S.C. §103(a), have been traversed, and respectfully requests that the Examiner reconsider and withdraw these rejections.

If a communication with Applicant's Attorneys would assist in advancing this case to allowance, the Examiner is cordially invited to contact the undersigned so that any such issues may be promptly resolved.

The Commissioner is hereby authorized to charge any additional fees that may be required for this amendment, or credit any overpayment, to Deposit Account No. 09-0458.

In the event that an extension of time is required, or may be required in addition to that requested in a petition for extension of time, the Commissioner is requested to grant a petition for that extension of time that is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to the above-identified Deposit Account.

Respectfully submitted,

JUDY J. KOGUT-O ' CONNELL ET AL.

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